

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

INTERNATIONAL BUSINESS MACHINES	)	
CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-122-LPS-CJB
	)	
GROUPON, INC.,	)	
	)	
Defendant.	)	

**MOTION AND ORDER FOR ADMISSION PRO HAC VICE**

Pursuant to Local Rule 83.5 and the attached certifications, counsel moves the admission *pro hac vice* of J. David Hadden, Saina S. Shamilov, Phillip J. Haack, and Adam M. Lewin to represent the defendant in this matter. Pursuant to this Court's Standing Order effective March 25, 2014, the fees for the above-listed attorneys will be submitted upon the filing of this motion.

ASHBY & GEDDES

*/s/ Andrew C. Mayo*

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*Attorneys for Defendant Groupon, Inc.*

Dated: August 16, 2016

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

INTERNATIONAL BUSINESS MACHINES	)	
CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 16-122-LPS-CJB
	)	
GROUPON, INC.,	)	
	)	
Defendant.	)	

**ORDER**

This \_\_\_\_\_ day of \_\_\_\_\_, 2016, the Court having considered the motion for the admission *pro hac vice* of J. David Hadden, Saina S. Shamilov, Phillip J. Haack, and Adam M. Lewin to represent the defendant in the above action; now therefore,

IT IS HEREBY ORDERED that counsel's motion is granted, and that the foregoing attorneys are admitted *pro hac vice*.

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United States District Judge

**CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE***

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, that I am admitted, practicing, and in good standing as a member of the Bar of the State of California, and, pursuant to Local Rule 83.6, that I submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules.

*/s/ J. David Hadden*

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J. David Hadden  
FENWICK & WEST LLP  
555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104  
(415) 875-2300

Dated: August 16, 2016

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*/s/ Saina S. Shamilov*

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Saina S. Shamilov  
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555 California Street, 12<sup>th</sup> Floor  
San Francisco, CA 94104  
(415) 875-2300

Dated: August 16, 2016

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*/s/ Phillip J. Haack*

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(415) 875-2300

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*/s/ Adam M. Lewin*

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